

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
PHILIP A. BROWN (deceased)	:	CASE NO. 1-19-05295-HWV
NANCY LEE BROWN	:	
Debtors	:	
	:	CHAPTER 13
TOYOTA MOTOR CREDIT CORPORATION	:	
Movant	:	
	:	
v.	:	
	:	
PHILIP A. BROWN (deceased)	:	
NANCY LEE BROWN	:	
Respondents	:	

**DEBTOR'S RESPONSE TO MOTION OF
TOYOTA MOTOR CREDIT CORPORATION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes Debtor, Nancy Lee Brown, by and through her attorneys, Imblum Law Offices, P.C., and respectfully represents:

THE PARTIES

1. Admitted in part and denied in part. Philip A. Brown is deceased.
2. Admitted in part and denied in part. Marlee Brown resides at 451 Walton Avenue, Hummelstown, PA 17036.

3. Admitted.

JURISDICTION AND VENUE

4. Admitted.

FACTUAL BACKGROUND

5. Admitted.

6. Admitted in part and denied in part. The Retail Installment Sale Contract speaks for itself. Strict proof is demanded.

7. Admitted in part and denied in part. The Certificate of Title speaks for itself. Strict proof is demanded.

8. Admitted. Further, Debtor offers to cure the arrearage through a 6 month Stipulation.

9. Admitted in part and denied in part. Debtor has no knowledge as to the balance due on the Contract.

10. Admitted in part and denied in part. Debtor has no knowledge as to the fair market value of the vehicle. Strict proof is demanded.

11. Admitted.

12. Denied. Debtor is providing adequate protection through post-petition payments. To the extent that the post-petition payments are in arrears, Debtor will make an offer in the near future to bring same current.

13. Denied. It is denied that sufficient grounds has been shown for relief from the stay or from the co-debtor stay.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: _____

1/25/22

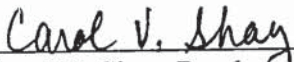
CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF TOYOTA MOTOR CREDIT CORPORATION FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

KERI P. EBECK, ESQUIRE
BERNSTEIN-BURKLEY, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.



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DATED: 1/25/2022